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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

KENNETH LARSON,

Debtor.

Chapter 13

Case No. 21-12639 (SLM)

NOTICE OF OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

Secured creditor, Robert Giannetti and Renee Giannetti (collectively “Secured Creditor”), which hold a judgment lien on the real property located at 20 Lakeside Trail, Kinnelon, State of New Jersey, hereby objects to confirmation of the Chapter 13 Amended Plan filed in the above captioned proceeding for the following reasons:

1. Secured Creditor objects to application of 11 U.S.C. § 522(d)(1) to the Debtor’s interest in 20 Lakeside Trail.
2. Secured Creditor objects to Debtor’s feasibility of the proposed plan due to debtor’s income being speculative. Debtor fails to provide proof of family contributions in support of feasibility of proposed chapter 13 plan.
3. Pursuant to 11 U.S.C. Section 1325(a)(5) the court shall confirm a plan only if at least one of three conditions relating to secured claims are met. The following conditions

have not been met, and therefore the proposed Plan cannot be confirmed:

- a. The Secured Creditor does not accept the proposed Plan, pursuant to 11 U.S.C. Section 1325(a)(5)(A).
 - b. The Plan does not cure all the pre-petition arrears due and owing Secured Creditor, in violation of 11 U.S.C. Section 1325(a)(5)(B)(ii).
 - c. The debtor has not demonstrated that he will be able to make all payments under the plan and to comply with the plan, pursuant to 11 U.S.C. Section 1325(a)(6).
4. Absent the Debtor modifying the proposed plan to satisfy at least one of the above itemized conditions, this plan should not be confirmed.

Based on the above, the Secured Creditor objects to confirmation as the proposed Plan unless the provisions in the Plan are modified to address the above itemized objections.

**SCURA, WIGFIELD, HEYER
STEVENS & CAMMAROTA, LLP**
Attorneys for Robert Giannetti and Renee Giannetti

/s/ Jamal J. Romero
Jamal J. Romero, Esq.

Dated: July 7, 2021